

Scoping Summary Report

Holcim Tire Derived Fuel Project Environmental Impact Statement Montana Department of Environmental Quality

March 2004

The Montana Department of Environmental Quality (DEQ) is preparing a comprehensive Environmental Impact Statement (EIS) pursuant to the Montana Environmental Policy Act (MEPA) regarding Holcim (US) Inc.'s request for alteration to its existing Montana air quality permit to allow the mid-kiln combustion of whole tires at its Trident cement manufacturing facility approximately 5 miles northeast of Three Forks, Montana.

Why is DEQ Preparing an EIS ?

DEQ is considering two permitting actions. The first action would be to issue Holcim a solid waste management system license for the storage of tires prior to incineration under the Montana Solid Waste Management Act (75-10-221, MCA). Because Holcim would collect and store tires, defined as a solid waste under 75-10-203 (11) (a), MCA, the Trident plant would be considered a Class III Resource Recovery facility under the Montana Solid Waste Management Act. The second action would be to alter Holcim's existing Air Quality Permit #0982 to allow for mid-kiln combustion of tires at the Trident facility.

An application to incinerate tires must meet the requirements of 75-2-215, MCA. Under these requirements, DEQ may not issue an air quality permit unless it determines that the proposed use of tires as fuel would constitute no more than a negligible risk to the public health, safety, and welfare, and to the environment. If DEQ determines that Holcim's applications meet the requirements of the Montana Solid Waste Management Act and the Clean Air Act of Montana and their implementing rules, the solid waste license will be issued and the air quality permit will be altered. Conditions may be applied to reduce or eliminate environmental impacts.

An environmental review pursuant to MEPA must be prepared whenever a state agency intends to take an action that could affect the human environment and that is not exempt from review by statute or rule. State actions include issuance of permits and licenses. The principal purpose of this EIS is to disclose the primary, secondary, and cumulative impacts of permitting Holcim to combust whole tires. The EIS will also identify potential alternatives and mitigation measures.

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Public Participation and Scoping Meetings Held to Date

Holcim submitted its initial application on October 3, 2001. Holcim held a public information meeting at Manhattan High School on December 18, 2001, which DEQ attended.

DEQ issued a Draft Environmental Assessment (EA) and Preliminary Determination for alteration to Holcim's air quality permit on March 24, 2003. The public comment period lasted until May 9, 2003, and then was extended to May 30, 2003, at the request of the Gallatin County Health Department. DEQ held a public meeting at the Manhattan Elementary School on April 29, 2003.

On August 15, 2003, DEQ issued a Final EA, which concluded that an EIS should be prepared. The public scoping period for the EIS extended from December 17, 2003, to January 23, 2004. DEQ held a public scoping meeting on January 20, 2004, at the Manhattan Elementary School.

Both oral and written comments were submitted at the two public meetings. Interested persons and groups and local and state government agencies also submitted comment letters and e-mail messages.

What Issues Were Identified During Scoping?

DEQ has prepared this scoping summary report to summarize by topic substantive comments it has received from December 2001 through the EIS scoping period. The comments will be reviewed and considered in the development of the list of issues to be addressed in the EIS.

Summary of Comments and Issues Identified From Public Scoping

The following tables present a summary of over 180 letters, e-mails, and scoping comment sheets, and over 2000 comments received by DEQ from December 2001 through the EIS scoping period, January 2004. The comments consist of those submitted orally at the public meetings and written comments received during the scoping periods. Where multiple commentors made similar comments, those comments were consolidated. Comments are grouped by topic or issue area listed below.

- Cumulative Impacts
- Alternatives
- Existing Trident Operations/Upsets
- Proposed Trident Facility Modifications to Burn Tires
- Air Quality, Emissions and Dispersion Modeling
- Pollution Control Technology
- Human Health Risk
- Ecological Risk
- Environmental Impacts

- Solid Waste/Tire Issues
- Property Value, Economic and Socioeconomic Impacts
- Agriculture and Organic Farming
- Fire Issues
- MEPA Considerations
- Air Permit Issues